VTA's BART Silicon Valley Phase II Extension Project

Addendum

To VTA's BART Silicon Valley Phase II Extension Project – Final Supplemental Environmental Impact Statement/ Subsequent Environmental Impact Report and Section 4(f) Evaluation

November 2022

SANTA CLARA VALLEY TRANSPORTATION AUTHORITY

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Acronyms

BSVII Project	BART Silicon Valley Phase II Extension Project
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
CSA	Construction Staging Area
CY	cubic yards
dBA	A-weighted decibels
EIR	Environmental Impact Report
FTA	Federal Transit Administration
GHG	greenhouse gas

I-	Interstate
IS	Initial Study
kV	kilovolt
L_{dn}	day–night average sound level
L_{eq}	equivalent continuous sound pressure level
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
$MTCO_2e$	metric tons of carbon dioxide equivalent
NO_X	nitrogen oxides
PG&E	Pacific Gas and Electric
PPV	peak particle velocity
ROG	reactive organic gases
SEIR	Supplemental EIR
SEIS	Supplemental Environmental Impact Statement
TBM	Tunnel Boring Machine
VdB	vibration velocity level
VMT	vehicle miles traveled
VTA	Valley Transportation Authority
WTP	West Tunnel Portal

Chapter 1
Introduction

1.1 Purpose of the Addendum

This document is an Addendum to the Final Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report and Section 4(f) Evaluation (2018 Final SEIS/SEIR) prepared for the BART Silicon Valley Phase II Extension Project (BSVII Project), which was certified by the VTA Board of Directors in April 2018. In accordance with the California Environmental Quality Act (CEQA), this Addendum for the BSVII Project describes and evaluates refinements to the BSVII Project since the VTA Board of Directors' certification of the Final SEIR in 2018 (Project Refinements) and demonstrates that all of the potential environmental impacts associated with the proposed Project Refinements would be within the envelope of impacts already evaluated in the 2018 Final SEIS/SEIR.

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that: "The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."

The mechanism for assessing the significance of these changes is found in CEQA Guidelines Sections 15162 – 15164. Under these Guidelines, a lead agency should prepare a subsequent or supplemental CEQA document if the triggering criteria set forth in CEQA Guidelines Section 15162 and 15163 are met. These criteria include a determination whether any changes to the project, or the circumstances under which the project will be undertaken, involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, a subsequent or supplemental CEQA document may be prepared if "new information" meeting certain standards under Guidelines Section 15162 is presented. If the changes do not meet these criteria, or if no "new information of substantial importance" is presented, then an Addendum per CEQA Guidelines Section 15164 is prepared to document any minor corrections to the Environmental Impact Report (EIR) or Initial Study/Mitigated Negative Declaration (MND).

Likewise, Public Resources Code Section 21166 states that unless one or more of the following events occur, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project which will require major revisions of the environmental impact report;

- Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis herein, the Project Refinements would not result in any new additional significant impacts, nor would it substantially increase the severity of previously anticipated significant impacts. Rather, all the impacts associated with the Project Refinements are within the envelope of impacts disclosed in the 2018 Final SEIS/SEIR and do not constitute a new or substantially increased significant impact. Based on this determination, the Project Refinements do not meet the requirements for preparation of a subsequent or supplemental EIR pursuant to Section 15162 of the CEQA Guidelines.

1.2 Overview of the Project

The BART Silicon Valley Phase II Extension Project (BSVII Project) consists of an approximately 6-mile extension of the BART system from the Berryessa/North San José BART Station through downtown San José to Santa Clara near the Santa Clara Caltrain Station. The BSVII Project includes a single-bore tunnel that is approximately 5 miles long that begins just south of the Berryessa/North San José BART Station and ends prior to the Newhall Maintenance Facility. The BSVII Project includes three underground stations in the City of San José (28th Street/Little Portugal Station, Downtown San José, and Diridon Stations), one at-grade station in the City of Santa Clara (Santa Clara Station), and the Newhall Maintenance Facility on the border of the Cities of San José and Santa Clara near the BSVII Project's terminus.

1.3 Previous Environmental Studies

- *Silicon Valley Rapid Transit Corridor – BART Extension to Milpitas, San Jose, and Santa Clara, Draft Environmental Impact Statement/Environmental Impact Report & Draft 4(f) Evaluation*, March 2004
- *Silicon Valley Rapid Transit Corridor – BART Extension to Milpitas, San Jose, and Santa Clara, Final Environmental Impact Report*, November 2004
- *Silicon Valley Rapid Transit Corridor – BART Extension to Milpitas, San Jose, and Santa Clara, Draft Supplemental Environmental Impact Report*, January 2007
- *Silicon Valley Rapid Transit Corridor – BART Extension to Milpitas, San Jose, and Santa Clara, Final Supplemental Environmental Impact Report*, May 2007
- *VTA's BART Silicon Valley Phase II Extension Project – Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report and Draft Section 4(f) Evaluation*, December 2016

- *VTA's BART Silicon Valley Phase II Extension Project – Final Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report and Section 4(f) Evaluation, February 2018*

1.4 Scope of this Addendum

The scope of this Addendum is to evaluate any Project Refinements resulting from the VTA Board of Directors' authorization, at the December 1, 2022, VTA Board Meeting, for the General Manager to issue contract amendments to Contract Package 2 (CP2) - Tunnel and Trackwork - with Kiewit Shea Traylor, a Joint Venture (KST). The contract amendments would include multiple Early Works Packages including the purchase of a Tunnel Boring Machine (TBM), associated TBM support, west portal construction activities, and Downtown San José Station enabling works as described in Section 2.1 below.

The Project Refinements relate solely to the CP2 Early Works Packages listed in Section 2.1 below; no refinements or changes are proposed for the operation of the BSVII Project. As a result, this Addendum only examines those topical areas that are related to the Project Refinements below to determine whether these refinements result in any substantial change to the environmental setting, impacts, and mitigation measures as described in previous environmental studies listed above.

Chapter 2
Proposed Project Refinements

2.1 Proposed Refinements to the Project

As mentioned above, the scope of this Addendum is to evaluate any Project Refinements in the Early Works Packages (EWP) listed below. Of these Early Works Packages, only EWP1, EWP2, EWP3, EWP 9, and EWP 11 contain refinements to the BSVII Project related to the topics listed in more detail below. There are no Project Refinements associated with EWP 5 and EWP 7.

Early Works Package	Description
EWP1	Tunnel Boring Machine (TBM) Tunnel Procurement
EWP2	Precast Final Lining
EWP3	West Portal Enabling Works
EWP5	Downtown San José Station Enabling Works
EWP7	Preconstruction Surveys, Instrumentation, & Monitoring
EWP9	TBM Tunnel Support Equipment
EWP11	West Portal TBM & Plant Power

2.1.1 Tunnel Boring Machine

As described in the 2018 Final SEIS/SEIR, the BSVII Project will include an approximately 5-mile tunnel that will be constructed with a TBM. Early Works Package 1 includes the purchase of the TBM. Since the VTA Board of Directors approved the BSVII Project and certified the Final SEIS/SEIR in 2018, the size of the tunnel has increased. The tunnel's inner and outer diameters will be increased from approximately 40 to 48 feet and approximately 45 to 52 feet respectively. Therefore, the size of the TBM will be increased to construct the larger tunnel diameter. The TBM will be increased from 45 feet in diameter up to approximately 54 feet. The tunnel depth remains within the range studied (approximately 60 feet deep on average) in the 2018 Final SEIS/SEIR. Refer to Section 3 *Environmental Evaluations* below.

2.1.2 Tunnel Boring Machine Power Connection

As described in the 2018 Final SEIS/SEIR, to provide power for operation of the TBM during construction, a temporary power substation would be located near the West Tunnel Portal at the site of High Voltage Substation SNH. This temporary substation would be served from PG&E's FMC substation by a 115 kV line, which would be constructed to also serve the permanent high voltage substation. Early Works Package 11 includes establishing

this substantial power supply. Since approval of the BSVII Project in 2018, VTA coordinated with the Peninsula Corridor Joint Power Board (PCJPB) to jointly utilize a tubular steel pole that was installed as part of PCJPB's 115 kV service connection to PG&E's FMC substation. Therefore, the path of the 115kV line has been modified from the description in the 2018 Final SEIS/SEIR to a direct connection to one tubular steel pole at the site of the BSVII Project's High Voltage Substation SNH. The tubular steel pole that will provide the BSVII Project's connection to PG&E's substation has been constructed by the PCJPB, and no change is proposed in the Project Refinements. Therefore, no additional CEQA analysis is required.

2.1.3 West Tunnel Portal Construction & Tunneling Support

As described in the 2018 Final SEIS/SEIR, the tunnel lining will be constructed of precast concrete segments installed by the TBM during the tunneling operation, including a concrete/grout batch plant and muck handling facilities in the Newhall Yard. Early Works Package 2 includes work associated with establishing the precast concrete facility and manufacturing the first run of tunnel segments, Early Works Package 3 includes enabling works for the West Tunnel Portal and construction of the TBM Launch Structure, and Early Works Package 9 includes procurement, installation, and testing of equipment supporting the West Portal logistics facilities. A sufficient quantity of tunnel lining segments must be available when the TBM arrives to optimize the schedule. Therefore, tunnel lining will be fabricated on-site at a temporary concrete manufacturing facility near the West Tunnel Portal within the future Newhall Maintenance Facility on VTA owned property. This will require expanded concrete batch plant facilities at the Newhall Maintenance Facility Construction Staging Area (CSA) for tunnel segment construction. The size of the concrete batch plant will accommodate the additional on-site casting work and storage of tunnel segments to support the construction of the tunnel but will remain within the footprint of the CSA. Refer to Section 3 *Environmental Evaluations* below.

Chapter 3
Environmental Evaluations

3.1 Environmental Evaluation

As noted above, the Project Refinements discussed in this Addendum relate solely to the activities within the Early Works Packages listed above in Section 2.1. As such, the environmental evaluation of the BSVII Project refinements is limited to short-term, construction-related impacts related to the specific topical areas of transportation, in particular impacts of truck traffic; air quality; greenhouse gas emissions; and noise & vibration.

The Project Refinements would not change any of the impact conclusions in the Certified Final SEIR related to biological resources and wetlands; socioeconomics, community services and facilities; cultural resources; hazardous materials; geology, seismicity, and soils; land use; vibration; utilities; visual quality and aesthetics; water resources, water quality, and floodplains; cumulative impacts; and growth-inducing impacts. All mitigation measures described in previous environmental documents for the BSVII Project are still applicable and will be implemented accordingly. The environmental evaluation of construction-related air quality, transportation, greenhouse gas, and noise and vibration of the Project Refinements are described below.

3.1.1 Transportation

As described in the 2018 Final SEIS/SEIR, construction of the BSVII Project would cause the addition of traffic from construction vehicles and trucks accessing the Newhall Maintenance Facility site and delivering supplies and materials to the site throughout the duration of construction for approximately eight years. Construction activities at the Newhall Maintenance Facility would include construction of all components of the maintenance facility in addition to construction of the West Tunnel Portal, 115-kV line connection, and systems facilities. The site would also be used as a laydown and storage area for construction of the tunnel. Large areas within the maintenance facility would be used for tunnel muck drying and storage and materials and equipment storage. The 2018 Final SEIS/SEIR concluded that the increase in traffic associated with the activities at the facility during construction of the BSVII Project would result in an adverse impact on vehicular traffic, bicyclists, and pedestrians even after implementation of Mitigation Monitoring and Reporting Program (MMRP) measures MMRP-TRA-CNST-A and MMRP-TRA-CNST-B.

As described in Section 2.1 *Proposed Refinements to the Project* above, the diameter of the TBM will increase from 45 to approximately 54 feet to construct the larger single-bore tunnel. A larger tunnel diameter may have a slightly slower progression rate, and the amount of muck produced will increase, as will the amount of material required to build the tunnel.

As described in the 2018 Final SEIS/SEIR, the BSVII Project would require the removal of excavated soils. Soil haul volumes to be removed and the estimated number of trucks to haul away the excavated materials were estimated for each project feature. Trucks were anticipated to operate 16 hours per day. The volume of excavated material was 1,550,000 cubic yards (cy), with an estimated 77,500 truck trips and 22 peak trucks per hour (the greatest number of trucks that would access the site during construction in an hour). Typically, the hourly truck volumes would be about two-thirds of this number.

For the larger-diameter tunnel, there will be increased truck traffic to off-haul the increased muck generated and to provide materials for the larger tunnel lining. The material truck deliveries were conservatively assumed to occur concurrently with soil/muck off-haul. Trucks would operate 16 hours per day regardless of TBM size. The volume of the excavated tunnel muck material that will require off-haul is approximately 2,929,500 cy. Based on haul trucks with a 20-cubic-yard capacity, there are an estimated 146,476 truck trips and a maximum 25 peak trucks per hour.

The increase of 22 to 25 peak trucks per hour represents an increase of approximately 14% and would not result in a substantial increase in peak hour trucks accessing the Newhall Maintenance Facility during construction as compared to what was previously analyzed in the 2018 Final SEIS/SEIR. Restrictions on truck haul routes have been incorporated into construction specifications, and any request by the contractor to change the routes would be subject to approval by the applicable city having jurisdiction. The haul routes are designed to minimize travel on local streets prior to accessing U.S. 101, I-280, I-880, and SR 87. Mitigation Measures TRA-CNST-A through TRA-CNST-C still apply and would be implemented to minimize the impacts of the increased trucking associated with the larger TBM and expanded facilities at the Newhall Maintenance Facility. However, even with mitigation incorporated, the BSVII Project would still result in an adverse effect on vehicular traffic, bicyclists, and pedestrians during construction as disclosed in the 2018 Final SEIS/SEIR. The construction-related transportation effects of the Project Refinements and level of impact significance would be substantially the same as reported in 2018 Final SEIS/SEIR as they relate to the construction of the BSVII Project. This Project Refinement would not result in a substantially more severe adverse effect than previously disclosed. Accordingly, this Project Refinement would not change any of the conclusions related to construction-related transportation impacts.

3.1.2 Air Quality

The 2018 Final SEIS/SEIR evaluated emissions resulting from construction of the BSVII Project. The emissions assessment accounted for maximum daily criteria pollutant and ozone-precursor emissions that would be generated by trucking activities. Table 1, below, presents a summary of the emissions modeling prepared for the 2018 Final SEIS/SEIR related to the maximum daily trucking activities in a construction start year of 2017. These emissions estimates were developed using the contemporary iteration of the California Air Resources Board (CARB) EMFAC mobile source emissions inventory model, which at the time of Draft SEIS/SEIR preparation was EMFAC2014. For the previous analysis, it was

assumed that trucks disposing of excavated material would travel up to 8,800 miles per day (8,800 vehicle miles traveled [VMT] daily) during tunnel boring.

Table 1: Haul Truck Emissions

Criteria Pollutant or Ozone Precursor	Pounds per Day				
	ROG	**NO_X**	**CO**	**PM10**	**PM2.5**
Offsite Emissions (Haul Truck Exhaust)					
Alum Rock/28th Street Station	0.7	20.4	4.1	0.5	0.3
Downtown San José Station (East and West Options)	0.7	20.4	4.1	0.5	0.3
Diridon Station (South and North Options)	0.7	20.4	4.1	0.5	0.3
13th Street Ventilation Structure	0.3	10.2	2.0	0.2	0.1
Stockton Avenue Ventilation Structure	0.3	10.2	2.0	0.2	0.1
West Portal	1.2	35.7	7.1	0.9	0.5
East Portal	1.2	35.7	7.1	0.9	0.5
Tunnel (muck) – West Portal to East Portal	3.8	112.2	22.4	2.7	1.5
Offsite Emissions (Haul Truck exhaust)					
Tunnel (muck) – West Portal to East Portal	1.6	78.1	20.5	3.9	1.7
Exceed 2018 Final SEIS/SEIR Maximum Haul Truck Emissions?	No	No	No	Yes	Yes
Source: *CARB, EMFAC2014, EMFAC2021.*					

Estimates for the larger-diameter tunnel indicate that maximum daily trucking activities could require approximately 400 trucks making 20-mile round trips to dispose of excavated materials, resulting in up to 12,000 daily haul truck VMT. CARB has updated its EMFAC model multiple times since the original 2018 Final SEIS/SEIR analysis was prepared, and the most recent iteration is EMFAC2021. Relying on the same methodology as disclosed in the 2018 Final SEIS/SEIR analysis, heavy-heavy duty truck (HHDT T7) emission factors from EMFAC2021 were used to estimate the maximum daily haul truck emissions that would be generated by 12,000 VMT in the earliest construction year of 2023, as shown in the bottom portion of Table 1.

Results of the emissions modeling demonstrate that maximum daily haul truck activities during construction of the larger-diameter tunnel would not generate emissions of reactive organic gases (ROG), nitrogen oxides (NOX), or carbon monoxide (CO) in excess of the magnitude of emissions previously disclosed in the 2018 Final SEIS/SEIR. The 2018 analysis determined that only NOX would be emitted by the BSVII Project's construction sources in excess of the applicable Bay Area Air Quality Management District (BAAQMD) mass daily threshold even after implementation of Mitigation Measures AQ-CNST-A through I. Maximum daily haul truck emissions were 112.2 pounds per day of NOX in the 2018 analysis, and maximum daily haul truck emissions of NOX for the larger diameter tunnel would be approximately 78.1 pounds per day. The lower magnitude of emissions despite the increased amount of hauling activity is attributed to the cleaner aggregate regional heavy-duty truck fleet as older vehicles have been phased out over the six-year period from 2017–2023. Therefore, construction activities for the larger diameter tunnel would not result in greater levels of maximum daily emissions of criteria pollutants or ozone precursors for

which significant impacts had been identified relative to the 2018 analysis. The air quality effects of the Project Refinements and level of impact significance would be substantially the same as reported in 2018 Final SEIS/SEIR as they relate to the construction of the BSVII Project. The Project Refinements would not result in a substantially more severe adverse effect than previously disclosed. Accordingly, the Project Refinements would not change any of the conclusions related to construction-related impacts to air quality.

3.1.3 Greenhouse Gas Emissions

The following sections of the 2018 Final SEIS/SEIR analyzed GHG emissions for the 45-foot-diameter tunnel. On pages 5-152 and 5-153 of Section 5.5.10 *Greenhouse Gas Emissions*, it states that construction of the Single-Bore Option Project would generate approximately 50,787 MTCO2e in the total amount of GHG emissions. On page 6.9-11 of Section 6.9.5 *Environmental Consequences and Mitigation*, the text states that, "[i]t is estimated that total GHG emissions associated with construction of the BART Extension would be 50,787 metric tons of carbon dioxide equivalent (MTCO2e) for the Single-Bore Option. Because construction activity would last eight years, estimated average annual CO2e emissions associated with the Single-Bore Option would be 6,348 MT of CO2e."

A screening exercise was completed to determine whether construction activities would generate additional GHG emissions for the larger-diameter single-bore tunnel beyond those previously disclosed in the approved 2018 Final SEIS/SEIR. The 2018 Final SEIS/SEIR calculations estimated that haul trucking activities involved in construction of the BSVII Project would generate a total of approximately 19,759 MTCO2e of the total 50,787 MTCO2e for the Single-Bore Option construction beginning in a scenario year of 2017. Updated calculations using a 2023 construction start date and the revised hauling estimates indicate that haul truck activities for construction of the larger-tunnel diameter would generate approximately 10,109 MTCO2e of GHG emissions. The lower magnitude of emissions despite the increased amount of hauling activity is attributed to the cleaner aggregate regional heavy-duty truck fleet as older vehicles have been phased out over the six-year period from 2017–2023. Therefore, analysis indicates that construction of the larger-diameter tunnel beginning in 2023, rather than beginning in 2017, will result in lower overall magnitudes of GHG emissions relative to the 2018 analysis. The GHG effects of the Project Refinements and level of impact significance would be substantially the same as or less than reported in 2018 Final SEIS/SEIR as they relate to the design and construction of the BSVII Project. The Project Refinements would not result in a substantially more severe adverse effect than previously disclosed. Accordingly, the Project Refinements would not change any of the conclusions related to construction-related impacts to GHG.

3.1.4 Construction Noise and Vibration

3.1.4.1 Tunnel Boring Machine (TBM)

As described in the 2018 SEIS/SEIR, the TBM would be a potential source of temporary groundborne noise/vibration during construction of the tunnel for up to 4 days as the TBM passes below each sensitive receptor. This was based on a typical progress rate of the TBM

of 30 to 40 feet per day depending on soil conditions encountered and operation of two 10-hour shifts per day with 4 hours for maintenance activities. In addition, operation of a muck train for muck removal within the tunnel may cause the potential for groundborne noise impacts. However, implementation of Mitigation Measures NV-CNST-P through NV-CNST-S reduced this potential impact to a less-than-significant level.

With a larger tunnel diameter, the typical progress rate of the TBM may be slightly slower, around approximately 30 to 35 feet per day with similar operating conditions, which is within the range of what was analyzed in the 2018 Final SEIS/SEIR. Also, the depth of the tunnel centerline would be slightly deeper, and the tunnel crown will remain at approximately the same depth. Therefore, the distance between the TBM and sensitive receptors has not changed. The BSVII Project would implement Mitigation Measures NV-CNST-P through NV-CNST-S, which would reduce this temporary impact to a less-than-significant level. Thus, this Project Refinement would not result in a substantially more severe adverse effect than previously disclosed.

3.1.4.2 West Tunnel Portal Concrete Batch Plant

As outlined in the 2018 Final SEIS/SEIR, the West Tunnel Portal CSA was identified for construction vehicle parking; construction equipment storage and usage; materials storage and assembly; TBM launch; and tunnel muck removal, drying, storage, and staging prior to off-hauling. The Final SEIS/SEIR included an analysis of a slurry batch plant to support operation of the TBM and construction of the tunnel. A noise impact analysis was performed for all construction activities anticipated at the Newhall Yard, including the slurry batch plant. The batch plant was anticipated to operate 24 hours a day, 7-days a week. The slurry batch plant noise at the West Tunnel Portal was projected to result in a minor noise impact to residences located on the west side of the alignment. However, implementation of a temporary noise barrier shielding the batch plant noise sources identified under Mitigation Measure NV-CNST-C would reduce this impact to a less-than-significant level.

To support efficient operation of the TBM, the Early Works Packages include a concrete batch plant at the Newhall Yard to fabricate tunnel liners as described in Section 2.1. The concrete batch plant would be very similar in nature to the slurry batch plant and would have the potential to result in similar impacts as disclosed and analyzed in the 2018 Final SEIS/SEIR. The BSVII Project would implement Mitigation Measure NV-CNST-C, which would mitigate potential construction noise impacts to a less-than-significant level. Thus, this Project Refinement would not result in a substantially more severe adverse impact than previously disclosed.

In conclusion, the noise and vibration effects of the Project Refinements and level of impact significance would be substantially the same as or less than reported in the 2018 Final SEIS/SEIR as they relate to the construction of the BSVII Project. The Project Refinements would not result in a substantially more severe adverse effect than previously disclosed. Accordingly, the Project Refinements would not change any of the conclusions related to impacts due to noise and vibration.

Chapter 4
Environmental Determination

4.1 CEQA Findings

The 2016 Draft and 2018 Final SEIS/SEIR evaluated the potential environmental impacts/effects of the construction and operation of the BSVII Project. This CEQA Addendum evaluates the project refinements associated with the activities that would be initiated as a result of the Board of Directors' authorization as described in Section 1.4 above.

Based upon the evaluation of the proposed Project Refinements to the approved BSVII Project, presented in this Addendum, VTA concludes that the analyses conducted and the conclusions reached in the 2018 Final SEIS/SEIR remain valid, and no supplemental environmental review is required for the Project Refinements, pursuant to the CEQA Guidelines Sections 15162, 15163, and 15164. This Addendum has not identified any new significant adverse impacts nor any substantial increase in the severity of any identified significant adverse impacts previously documented for the BSVII Project, nor has any "new information of substantial importance" been presented pursuant the CEQA Guidelines Section 15162. No new mitigation has been identified, and all mitigation measures described in the Final SEIS/SEIR are still applicable and will be implemented as required by the approved 2018 (MMRP). Therefore, an Addendum to the Final SEIS/SEIR is the appropriate environmental document. Should additional refinements beyond the scope of the BSVII Project trigger the need for additional environmental review pursuant to CEQA Guidelines Section 15162 and other applicable provisions of CEQA, VTA will prepare the necessary additional environmental analysis.